

EXHIBIT E

Draft of February 5, 2020

DRAFT — FOR DISCUSSION PURPOSES
FRE 408 / SUBJECT TO MEDIATION PRIVILEGE

MOVANTS' INFORMAL DOCUMENT REQUESTS RELATED TO CCDA¹

REQUEST NO. 1

Documents sufficient to show each transfer and/or deposit of Hotel Taxes to the Tourism Company or to GDB, including, without limitation, each transfer and/or deposit to the Tourism Company account at First Bank, and each subsequent transfer thereof, from July 1, 2015 to the present, including (a) the date of the transfer, (b) the transferor, (c) the transferee, (d) the amount of the transfer, (e) information sufficient to identify and distinguish particular accounts, (f) all account holders or beneficiaries, and (g) all transmittal information associated with the transfer, including, without limitation, all Fedwire or ACH transaction fields, memo lines, accompanying memoranda, beneficiary information, addenda information, or other remittance or reference information.

REQUEST NO. 2

Documents sufficient to show the total amount of Hotel Taxes presently held by the Tourism Company, GDB, CCDA, or the Commonwealth or its instrumentalities, including, without limitation, information sufficient to identify the particular account(s) where such funds are retained; each account holder, financial institution, and beneficiary; and the cash balance of the accounts.

REQUEST NO. 3

Documents, communications, or Agreements (including, without limitation, drafts thereof) to which the Commonwealth, the Tourism Company, CCDA and/or GDB is a party relating to the Hotel Taxes, the flow of funds for CCDA, the use of Hotel Taxes, and/or the CCDA Bond Documents.²

REQUEST NO. 4

All reports provided by the CCDA to the Legislature and Governor of Puerto Rico pursuant to the CCDA Enabling Act. *See* 23 L.P.R.A. § 6464.

REQUEST NO. 5

All appropriation requests made by CCDA for reimbursement of clawed-back Pledged Hotel Taxes.

¹ Terms not defined herein have the same meaning as in the CCDA Lift Stay Motion (Case No. 17-3283, ECF No. 10,104) and draft CCDA Complaint (Case No. 17-3283, ECF No. 10,104-2).

² “Bond Documents” as defined in the CCDA Complaint ¶ 36 (ECF No. 10,104-2).

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REQUEST NO. 6

Documents sufficient to show the terms, scope, and effects of purported restrictions placed on CCDA-related funds, including but not limited to those funds described as “restricted” in the Commonwealth’s “Summary of Cash Restriction Analysis” dated Oct. 2, 2019.

REQUEST NO. 7

Documents sufficient to show the amount of Hotel Taxes collected in each Fiscal Year from Fiscal Year 2016 to the present, including the amount of Pledged Revenues collected in the current Fiscal Year.